

# **EXHIBIT**

# **PP**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

**DECLARATION OF JOSE SANCHEZ**

I, Jose Sanchez, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of the terrorist attacks, I worked as a porter with American Building Maintenance. My office was located in the basement (Level B-1) of the North Tower of the World Trade Center. Attached herein as Exhibit B to this Declaration is a true and correct copy of my proof of employment.

4. I arrived for work in the basement of the North Tower at 8:00 a.m. on the morning of 9/11. When the first passenger jet, American Airlines Flight 11, struck the North Tower, I had been working with a mechanical worker named Hursley Lever in the machine shop. We heard an explosion, so we went to the entrance of the B4 Machine Shop to investigate the cause of the explosion.

5. As we reached the doorway to leave the room I saw a sudden flash of light and I felt a sudden blast of air, and fire washed over me. The force of the blast slammed us both to the floor and up against a wall. The fire burned my facial hair and my scalp and I injured my neck and back.

6. The room then began to fill with smoke and debris. As Hursley had severely injured his leg in the blast, I helped him to his feet and we began to go out the back entrance to the parking lot. We then made our way to a fire exit. We saw other people who were trying to escape from the area. A gentleman used an ace bandage to wrap Hursley's leg and others carried him to a vehicle so he could go to a hospital.

7. I then tried to exit into the parking lot of the North Tower through the nearest exit and up several flights of stairs to the bank escalators, but I was unable to cross the plaza. I proceeded to run down the stairs to where I started and across to the parking lot to the newsstand area and up the escalators to the nearest exit. As I looked at the devastation and carnage unfolding in the upper section of the North Tower, I watched in horror as the second passenger jet, United Airlines Flight 175, struck the South Tower. Building debris and airplane parts began raining down on top of me. Everyone near me began to panic. To avoid the building debris, I initially ran into a post office building. I then exited the post office, crossed an open area by way of another exit, and then I finally exited the World Trade Center Complex. I ran away from the area and towards 34th Street. As I ran away from the area, I turned and watched as the South Tower and then the North Tower collapsed. Injured and in shock, I managed to take a ferry to Hoboken, New Jersey, and then I walked the rest of the way to my home in Jersey City.

8. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: burns to my face, scalp, and head; muscle spasms in my back and

neck; a cervical strain; a disc herniation at C4-5, a disc bulge at C5-6, lumbar radiculopathy, and central disc herniation at L5-S1; insomnia.

9. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from PTSD, anxiety, and bouts of depression due to these traumatic events almost daily, triggered by certain smells, sounds and views. The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day.

10. I sought and continue to seek medical attention for the injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

11. I previously pursued a claim through the September 11th Victim Compensation Fund (VCF Number VCF0001902) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 18 day of July 2021.

  
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Declarant Jose Sanchez

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
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